

[illegible]

any particular problematic label statements? Difficult and not impossible to comply anyway, but anything stand out as something that is impossible to comply/enforce?
have a penalty matrix, dicamba violation is per acre of the application and it goes up by the number of violations. Some farmers are just spraying whne the pigweed is too tall and not getting a good kill, which is off label and increasing resistance. seeing a lot of resistance in TN. taking 2 shots over the top to kill them. recordkeeping, wind direction/sensitive crop-hard to prove. have had 10 complaints, but that is not representative of what is going on. have walked the fields, about 1000 acres, but didn't turn into formal complaints. cyress trees. a lot of producers are getting away from extend, to protect the trees. and you can see the tree damage. liberty is fine.

Matt Sunseri/Josh Stamper	MN	84 y			MN June 20, 3rd year. It has limited the damage in the past, but the first week of june was chaotic with lots of hurried choices in poor weather, but no comprehensive analysis of data at this time.
Doug Ownes	IL	79 y			hard to tell, numbers are lower but had 10 less days than last year-june 25th. Still have time, bc last year had a lot in early august. Not sure of the impact yet. Working on second hand info. Still quite a bit of damage out there, but may not be reported.
Brian V	MI	4 y			
Ryan King/matt beal	OH	3 y			
Dave Scott	IN	63 y			overall compaints are down overall, 1/3 total complains of last year, june 20 date, seems like it has had an effect.
R6					
Ryan Williams	OK	1 y		all-soy+cotton	
Dale Scott	TX	3 y		all	
Susie Nichols	AR	144 y			May 30 cut off date for 2 yrs,(before it was Apr 15?). if people would follow the cut off date it would be effective. Still getting positive detections, so know it is not followed-misused. It is a \$25,000 fine. Almost caught up for the 1300 cases in 2017.
R7					

have had one complaint by registrant regarding use of older product. In middle of investigatin righ now. Have also had a couple investigators try to follow up on figuring out which label/new product which was used. Applicators do not have the product anymore, don't have the container, but say they don't have updated label-say retailers sold older labels. a question is how good a job are the registrants doing stewarding the different label in the marketplace.	
have heard rumors of folks trying to buy older stuff, but nothing concrete.	
have had a lot of calls asking if the labs can tell the difference bt older and newer, can see where that is going. Folks are not giving up records.	yes, but don't have answer yet.

<p>most violations are recordkeeping, which is a label violation now (stiffer penalty), wind direction and speed are most common three. Would also add neighboring and adjacent non defittions are hard to comply with.</p>
inversion language
adjacent/neighboring
<p>?, but Im not sure what? Dave Scott weighed in about how low the penalty is, and saying no one is concerned otherwise. \$25000 per violation in AR. Sending out \$100K letters now, all legal responses now. Scott- immediately points out how difficult to comply. AR is doing it per field, so it stacks up.</p>

Dawn Wall	Missouri	37	y		
Tim Creger	NE	35	with permis sion		
Gretchen Paluch	IA	111	y		
Duane	KS	17	y		
R8					
Tom Gere	SD	11	y		June 30, believe it has helped, have had it for 2 yrs. Seems like more damage than reported. This year folks got in the field earlier. That helps. It seemed to have worked best premixed with a residual herbicide of some kind.
John Scott	CO	0	y		
eric delzer/andrew	ND	10- a lot of inform al as well	y		fair amount of damage in SE corner, think the cutoff date is helpful, past 2 yrs better than 2017. this year last 2 wks of june very hot and humid. Don't have good data, folks aren't completing survey. Overall cut off date does help curb some of the damage. June 30.
R9 & 10					
	arizona	o	y		

epa can reach out to registrants to ask about sales to see if that is happening-more older formultn sales- as well to help point us in the right direction. Not necessarily a problem today, but was in 2016. recognize it will be a problem moving forward. Not being able to differentiate in lab is a big issue.	not rup so no records.
	don't believe sla has done it, informal info says probably yes, but no first hand knowledge. In days after court ruling most all of the registrants quit distributing right away. So a mad rush for all dicamba formulations- informal. Whatever epa does or doesn't do, the genetics are not coming out of those seeds.

Epa refusing to define the training standards as they would for other products, highly frustrating. Decided to reduce or prohibit all training programs next year if it comes to it and think it needs to be addressed by epa. Both registrant, private, and state training-that should be epas decision and not put the state in the position of decided what needs to be included. causes a patchwork.

what is simmering is the label allowing a plethora of tank mixes that have been demonstrated reoutinely to increase volatility. The info is so strong, why are they allowed to continue? AR can't tank mix with glyphosate.

Reed intends to reach out to epa, will them them know the states are willing to engage. That means we may have as short as possible a survey soon. We could set up a call with epa if its okay with the states so epa can hear things first hand.					
AR- are you getting hostility and pushback from the farmer community? Anyone experiences that? TN- not really. They have been pretty cooperative so far, but only 2 years.					



